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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., § 963)

JEAN DANTES and WESVER DANTES,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

VINCENT MARINO, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 21, 2012, within the Eastern District of New York and elsewhere, the defendants JEAN DANTES and WESVER DANTES did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 952(a).

(Title 21, United States Code, Sections 963.)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. On June 21, 2012, defendants JEAN DANTES and WESVER DANTES arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard American Airlines Flight No. 896 from Port Au Prince, Haiti.

2. The defendant JEAN DANTES was selected for a Customs and Border Protection ("CBP") enforcement examination. The defendant JEAN DANTES presented a suitcase for inspection and responded "yes" when asked if the suitcase and all of its contents belonged to him.

3. An examination of the suitcase presented by the defendant JEAN DANTES revealed a foul smelling odor and the bottom of the suitcase was unusually thick. CBP officers probed the bottom of the suitcase, revealing a white powdery substance which field-tested positive for cocaine. The total approximate gross weight of the cocaine found in the defendant JEAN DANTES' suitcase was 3,530 grams.

4. Defendant WESVER DANTES also was selected for a CBP enforcement examination. The defendant WESVER DANTES presented a suitcase for inspection and responded "yes" when asked if the suitcase and all of its contents belonged to him.

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

5. An examination of the suitcase presented by WESVER DANTES revealed a foul smelling odor and the bottom of the suitcase was unusually thick. CBP officers probed the bottom of the suitcase, revealing a white powdery substance which field-tested positive for cocaine. The total approximate gross weight of the cocaine found in the defendant WESVER DANTES' suitcase was 3,313 grams.

6. The defendants JEAN DANTES and WESVER DANTES each confirmed that they are brothers and were traveling together. The total approximate gross weight of the cocaine found in the luggage of the defendants JEAN DANTES and WESVER DANTES was approximately 6,843 grams.

7. The defendant WESVER DANTES was placed under arrest and advised of his Miranda rights, which he waived. He then stated, in sum and substance and in part, that he knew he was transporting narcotics and that he understood that he would be paid approximately \$8,000 per bag for doing so. He further stated that his brother JEAN DANTES did not know about the narcotics in the suitcases and had waited outside in the car while the two suitcases were packed.

8. The defendant JEAN DANTES was placed under arrest and advised of his Miranda rights, which he waived. He then stated, in sum and substance and in part, that he did not know that he was transporting narcotics. Contrary to WESVER DANTES'

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statements, however, JEAN DANTES did not say that he had waited outside in the car while the suitcases were packed, but rather stated that he had been inside and had observed the unpacked suitcases provided for the trip and had personally been asked to transport one of the suitcases.

9. WHEREFORE, your deponent respectfully requests that the defendants JEAN DANTES and WESVER DANTES be dealt with according to law.



VINCENT MARINO
Special Agent
Homeland Security Investigations

Sworn to before me this
22nd Day of June, 2012

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